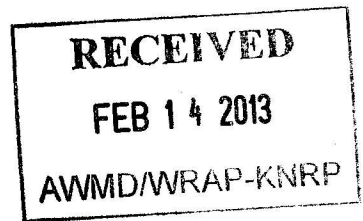




**Environmental
Operations, Inc.**
CLEARING THE WAY



February 12, 2013

Mr. Bruce Morrison
Project Manager
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219

RE: Monthly Progress Report
Solutia – John F. Queeny Plant
St. Louis, Missouri
EPA ID No. MOD 004 954 111

Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is providing this Monthly Progress Report for the John F. Queeny Plant formerly owned by Solutia. We are providing this Progress Report in order accordance with the reporting requirements of the EPA Docket No. RCRA-07-2009-0015 Consent Order which became effective December 18, 2009. Per the Interim Measures Work Plan, these reports will be submitted every month.

Reporting Period

January 1, 2013 – January 31, 2013

Description of the work conducted pursuant to the Order during the reporting period.

- EOI received the second shipment from Regenesys on January 2, 2013.
- The second injection event in the FF Area, APA, and FBCSA began on January 7, 2013. The event was completed on January 24, 2013. The FF Area had 56 injection locations, the APA had 69 injection locations, and the FBCSA had 60 injection locations.
- EOI received the EPA letter dated January 18, 2013 from Bruce Morrison regarding the Annual Baseline Groundwater Monitoring Report. EOI will make the requested revision to include data from the first injection event. EOI also proceeded with implementing the revised groundwater sampling schedule as presented in the report and the modification for LPZ-2 noted in the letter.
- EOI initiated the groundwater sampling event with collection of site-wide groundwater levels starting on January 30, 2013.
- EOI initiated delineation on January 23, 2013, in the VV Area for PCB concentrations less than 100 and greater than 10 parts per million.

RCRA



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Mr. Bruce Morrison
February 12, 2013

Estimate of the percentage of the project completed during the reporting period

- 4%

Description of the projects scheduled for completion during the reporting period which were not completed; statement explaining why and updated completion date.

- Not applicable.

Copies of all data and sampling and test results and all other laboratory deliverables received by Respondent during the reporting period.

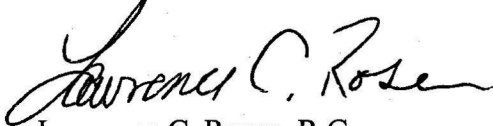
- Not applicable

Description of the projects and actions which are scheduled for the following reporting period.

- EOI will continue delineation in the VV Area for PCB concentrations less than 100 and greater than 10 parts per million.
- EOI will complete the groundwater sampling round which began in January 2013.
- EOI will submit a letter outlining plans for investigation in the vicinity of MW-38A and MW-38B.
- EOI/SWH will continue to work with the EPA regarding financial assurance information modifications and will respond accordingly.

If there are questions or concerns related to this Progress Report please contact Larry Rosen or Matt Robinson or who can be reached by phone at (314) 241-0900, or via email at larryr@environmentalops.com or matt@environmentalops.com.

Respectfully submitted,
ENVIRONMENTAL OPERATIONS, INC.



Lawrence C. Rosen, R.G.
Senior Project Manager

Copy: Mr. Matt Robinson/EOI
Mr. Michael House/Solutia
Ms. Christine Kump-Mitchell/MDNR
Mr. Rich Nussbaum/ MDNR